

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,
Plaintiff,
v.
GOOGLE LLC,
Defendant.

Civil Action No. 1:19-cv-12551 FDS
Hon. F. Dennis Saylor IV

**GOOGLE'S PROPOSED PROTECTIONS
REGARDING THE PRODUCTION OF SAMPLES**

Pursuant to the Court's instructions at the January 19, 2021 hearing on Singular's motion to compel the production of sample boards, Google respectfully proposes the following language to address the security of its proprietary hardware:

Physical samples shall be stored in the same manner as paper copies of source code, as set forth in Section 9(v)-(vii) of the Protective Order. *See* Dkt. 87 at 17-20. Specifically, Singular shall (i) store physical samples as well as related notes, photographs, videos or other documentation at Prince Lobel's office in a manner that prevents unauthorized access or inspection (e.g., in a locked room or cabinet when not in use); and (ii) maintain a log of any access to or inspection of the physical samples.

The proposed language implements the safeguards adopted by both Parties in the Source Code provisions of the Protective Order. *See* Dkt. 87 at 17-20 (providing safeguards for physical copies of source code in a Receiving Party's possession).

Respectfully submitted,

Dated: January 21, 2021

By: /s/ Nathan R. Speed

Gregory F. Corbett (BBO #646394)
gregory.corbett@wolfgreenfield.com
Nathan R. Speed (BBO # 670249)
nathan.speed@wolfgreenfield.com
Elizabeth A. DiMarco (BBO #681921)
elizabeth.dimarco@wolfgreenfield.com
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
Telephone: (617) 646-8000
Fax: (617) 646-8646

Asim Bhansali (*pro hac vice*)
abhangsali@kblfirm.com
KWUN BHANSALI LAZARUS LLP
555 Montgomery Street, Suite 750
San Francisco, CA 94111

Matthias Kamber (*pro hac vice*)
mkamber@keker.com
KEKER, VAN NEST & PETERS LLP
633 Battery Street
San Francisco, CA 94111-1809

Attorneys for Defendant Google LLC

CERTIFICATE OF SERVICE

I certify that on January 22, 2021, I served this document on Plaintiff by causing a copy to be sent via electronic mail to its counsel of record.

/s/ Nathan R. Speed
Nathan R. Speed